

Exhibit A

Civil Action No. _____

ZELL & Co.

AN AFFILIATE OF FANDZ INTERNATIONAL LAW GROUP

Jerusalem

August 8, 2010

BY FACSIMILE

Kevin J. Janet, FOIA Officer
Transportation Security Administration
Freedom of Information Act Office, TSA-20
11th Floor, East Tower
601 South 12th Street
Arlington, VA 20598-6020

RE: RYAN B. SKUROW
PRIVACY ACT REQUEST

Dear Mr. Janet:

My name is L. Marc Zell (U.S. Passport No. 711439323) and I am a U.S.-Israeli attorney, admitted to practice before the courts of the District of Columbia, the State of Maryland, the Commonwealth of Virginia, and the State of Israel.

Our office represents Mr. Ryan B. Skurow, U.S. Passport No. 711440777, Social Security Number 278-78-4646. His current address is 558/21 Tirosh Street, Jerusalem, Israel 93857. He was born on June 9, 1975 in the State of Georgia. Attached to this Request please find a signed statement from Mr. Skurow authorizing our office to obtain the information requested here on his behalf.

This request is made under the Privacy Act, 5 U.S.C. § 552a, for all records held by your department pertaining to Mr. Skurow. Mr. Skurow has been detained, searched, and questioned by the TSA on a number of occasions when entering the United States; upon inquiry, he was informed that he was on a "watch list" due to relatively minor incident occurring overseas over a decade ago. Attempts to resolve this issue through a TRIP request and other measures have so far met with no response, so we are filing this Privacy Act request for all information you have relating to Mr. Skurow.

As the information related to passenger details, it would most likely be filed under the DHS/TSA 001 system of records, although it may also be found in DHS/TSA 019, also relating to air passengers. As

Jerusalem

21 Herzog Street
Jerusalem 92387 Israel
+972 (2) 633 6300
+972 (2) 672 1767 fax

Washington DC

11710 Plaza America Drive
Suite 120
Reston, VA 20190
+1 (571) 203 9355
+1 (571) 323 5266 fax

Moscow

Mira Prospekt 16/2
Moscow 129010
Russian Federation
+7 (495) 589 9192
+7 (495) 795 4219
+7 (495) 589 9193 fax

New York

Empire State Building
350 Fifth Avenue, 59th Floor
New York, NY 10118-0069
+1 (212) 971 1349
+1 (212) 253 4030 fax

Tel Aviv

39 Montefiore Street
Third Floor
Tel Aviv 65201 Israel
+972 (72) 220 4030
+972 (72) 220 4039 fax

Privacy Act Request
Kevin J. Janet
Transportation Security Administration
Department of Homeland Security
August 8, 2010
Page Two

the original incident occurred in 1998 and Mr. Skurow was first stopped by TSA in 2007, the records may have been created any time prior to the latter date. Regardless, we request all information the Department of Homeland Security has relating to Mr. Skurow, no matter when created or where or with which agency it is filed.

Following please find my contact information. Please direct all correspondence there.

L. Marc Zell, Adv.
Zell & Co.
21 Herzog Street
Jerusalem 92387
Israel
T: 011-972-2-633-6300
F: 011-972-2-672-1767

Thank you in advance for your prompt attention to this matter. I look forward to hearing from you.

Respectfully submitted,

L. Marc Zell, Adv.

cc: Mr. Ryan B. Skurow

Enclosure

558/21 Tirosh Street
Jerusalem 93857, Israel
August 4, 2010

Kevin J. Janet, FOIA Officer
Transportation Security Administration
Freedom of Information Act Office, TSA-20
11th Floor, East Tower
601 South 12th Street
Arlington, VA 20598-6020

Re: Privacy Act Request, Authorization to Release Information to Another Person

Mr. Janet:

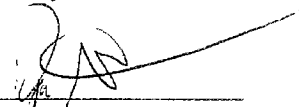
My name is Ryan B. Skurow, U.S. Passport No. 711440777, Social Security Number 278-78-4646. I currently reside at 558/21 Tirosh Street, Jerusalem 93857, Israel. My telephone number is 011-972-54-747-5414. I was born on June 9, 1975 in the State of Georgia.

As per the attached Privacy Act request submitted by my attorney, L. Marc Zell, and pursuant to the Privacy Act of 1974 (5 U.S.C. § 552a(b)), I authorize the U.S. Department of Homeland Security to release any and all information relating to my Privacy Act request to my representative.

My representative is L. Marc Zell, Adv., of 21 Herzog Street, Jerusalem 92387, Israel. His telephone number is 011-972-2-633-6300.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct, and that I am the person named above. I understand that any falsification of this statement is punishable under the provisions of 18 U.S.C. § 1001 by a fine of not more than \$10,000 or by imprisonment of not more than five years, or both.

Signed: _____


Ryan B. Skurow

Date: 8/8/10

Exhibit B

Civil Action No. _____

U.S. Department of Homeland Security

Freedom of Information Act Office
601 S 12th Street, TSA-20
Arlington, VA 22202



Transportation
Security
Administration

August 17, 2010

Mr. L. Marc Zell
Zell & Co.
21 Herzog Street
Jerusalem 92387
Israel

Re: TSA 10-0736

Dear Mr. Zell:

This letter acknowledges receipt of your Freedom of Information Act/Privacy Act (FOIA/PA) request to the Department of Homeland Security (DHS), dated August 8, 2010, and referred to the Transportation Security Administration (TSA) on August 13, 2010, seeking information pertaining to Ryan B. Skurow. Your request was received in this office on August 13, 2010.

Due to the increasing number of FOIA requests received by this office, we may encounter some delay in processing your request. Per Section 5.5(a) of the TSA FOIA regulations, 6 C.F.R. Part 5, the Department processes FOIA requests according to their order of receipt. Although TSA's goal is to respond within 20 business days of receipt of your request, the FOIA does permit a 10-day extension of this time period. As your request seeks numerous documents that will necessitate a thorough and wide-ranging search, TSA will invoke a 10-day extension for your request, as allowed by Title 5 U.S.C. § 552(a)(6)(B). If you care to narrow the scope of your request, please contact our office. We will make every effort to comply with your request in a timely manner.

Provisions of the Act allow us to recover part of the cost of complying with your request. We shall charge you for records in accordance with the DHS Interim FOIA regulations as they apply to non-commercial requestors. As a non-commercial requestor you will be charged 10-cents a page for duplication, although the first 100 pages are free, as are the first two hours of search time, after which you will pay the per quarter-hour rate (\$4.00, \$7.00, \$10.25) of the searcher. We will construe the submission of your request as an agreement to pay up to \$14.00. You will be contacted before any further fees are accrued.

We have queried the appropriate program offices of TSA for responsive records. If any responsive records are located, they will be reviewed for determination of releasability. Please be assured that one of the

processors in our office will respond to your request as expeditiously as possible. We appreciate your patience as we proceed with your request.

If you have any questions or would like to discuss this matter, please feel free to contact this office at (866) 364-2872 or via e-mail at Foia@tsa.dhs.gov and refer to TSA10-0725.

TSA FOIA OFFICE

Exhibit C

Civil Action No. _____

ZELL & Co.

AN AFFILIATE OF FANDZ INTERNATIONAL LAW GROUP
International Attorneys & Advocates

Jerusalem
13 January 2011

VIA INTERNATIONAL COURIER/ELECTRONIC MAIL

Theodore D. Chuang, Esq.
Associate General Counsel (General Law)
Department of Homeland Security ("DHS")
245 Murray Lane
Mail Stop 0485
Washington, DC 20528-0485

RE: RYAN B. SKUROW
FOIA/PRIVACY ACT APPEAL
TSA REFERENCE NOS. TSA 10-0736 and
TSA 10-0725

Dear Colleague:

This office represents Ryan B. Skurow, a United States citizen, U.S. Passport No. 711440777. On August 8, 2010, Mr. Skurow requested "all records held by your department pertaining to Mr. Skurow" from the Transportation Security Administration ("TSA") pursuant to the Privacy Act, 5 U.S.C. § 552a, and the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 and the DHS Regulations promulgated thereunder. This request was made on account of Mr. Skurow having been detained, searched, and questioned by the TSA on a number of occasions when entering the United States, allegedly because he has been placed on a watch list due to a relatively minor incident occurring overseas over a decade ago, which bore no relation to the security of the United States. Attempts to clarify the issue through the DHS-TRIP program were not productive.

Mr. Skurow's FOIA/Privacy Act request was met with a preliminary response on August 17, 2010 from the TSA Freedom of Information Act Office, TSA-20 (the "TSA FOIA Office"), acknowledging receipt of the request on August 13, 2010, assigning it the above-mentioned reference numbers, and invoking a ten-day extension pursuant to 5 U.S.C. § 552(a)(6)(B).

However, since that time, almost 150 days ago, neither this office nor our client has yet to receive the courtesy of a response providing the requested information, effectively denying Mr. Skurow's request. On November 17, 2010, ninety days after the preliminary response of August 13, 2010, we again contacted the TSA FOIA Office, but received no response. The failure of DHS to respond to Mr. Skurow's requests constitutes a blatant

Letter to Theodore Chaung, Esq.
Associate General Counsel (General Law)
Department of Homeland Security
13 January 2011
Page 2

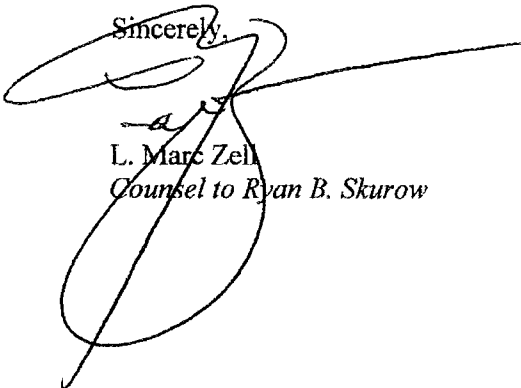
violation of the express provisions of the FOIA and Privacy Act and DHS's own regulations thereunder.

Pursuant to interim final rules of the Department of Homeland Security implementing the Freedom of Information and Privacy Acts, specifically 6 CFR §§ 5.9 and 5.25, Mr. Skurow hereby appeals the denial of his FOIA/PA request. We reiterate our longstanding request that Mr. Skurow, through his undersigned counsel, be provided immediately with the all records held by the Department of Homeland Security pertaining to Mr. Skurow

Attached to this letter please find a copy of the original request and the aforementioned correspondence.

Should DHS continue to evade its responsibilities under the Privacy Act and FOIA, we have been instructed to file suit in the United States District Court for the District of Columbia, where we shall seek appropriate relief, including but not limited to attorney's fees and litigation costs pursuant to 5 U.S.C. §552(a)(4)(E) and 5 U.S.C. §552a (g).

Sincerely,



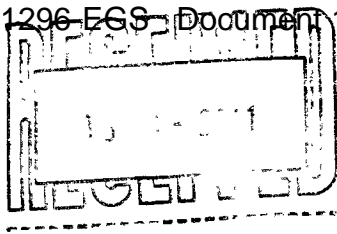
L. Marc Zell
Counsel to Ryan B. Skurow

Enclosures

cc (w/o encl.): Ryan B. Skurow

Exhibit D

Civil Action No. _____



U.S. Department of Homeland Security
Transportation Security Administration
Washington, DC 20598-6033



**Homeland
Security**

APR - 8 2011

Mr. L. Marc Zell
Zell & Co.
21 Herzog Street
Jerusalem, Israel 92387

RE: TSA11-0348

Dear Mr. Zell:

This is in further response to your letter dated January 13, 2011, appealing the lack of response by the Transportation Security Administration (TSA) to your Freedom of Information Act (FOIA) request concerning your original request TSA10-0736 seeking records concerning Mr. Ryan B. Skurow. Although the FOIA permits you to appeal the constructive denial of your request, this office cannot act until an initial determination has been made as to whether any responsive records may be released. I have forwarded your information and your interest in resolving this matter as quickly as possible to the TSA FOIA Office.

Should you choose to do so, you may treat this response as a denial of your appeal, and obtain judicial review of this decision pursuant to the provisions of 5 U.S.C. § 552(a)(4)(B) in the United States District Court in the district in which you reside, or in which the agency records are situated, or in the District of Columbia.

Sincerely,

Kimberly Walton
Special Counselor